

AO 91 (Rev. 5/85) Criminal Complaint

United States District Court

FILED

STATE AND JUDICIAL

DISTRICT OF

NEW MEXICO

UNITED STATES DISTRICT COURT
ROSWELL, NEW MEXICO

DEC 26 2008

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CLERK

Steven Stevens

CASE NUMBER:

08-Rm,
5:08-mj-139

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about December 25, 2008 in Lea County, in the Judicial District of New Mexico defendant(s) did, (Track Statutory Language of Offense)

Knowingly and intentionally persuade, induce, entice, or coerce a minor to engage in sexual activity chargeable as a criminal offense; knowingly and intentionally attempt to transport a minor to engage in criminal sexual activity; and, travel in interstate commerce with intent to engage in illicit sexual conduct,

in violation of Title 18 United States Code, Section(s) 2422(b) & 2423(a)(b).

I further state that I am a(n) Special Agent of the Federal Bureau of Investigation and that this complaint is based on the following facts:

Official Title

See Attached Affidavit.

Continued on the attached sheet and made a part hereof:

☒ Yes☐ No

AUSA Stephen Wong

Sworn to before me and subscribed in my presence.

Signature of Complainant

Steven Nardoni

Special Agent

Federal Bureau of Investigation

12/26/08

Date

at

Roswell, NM

City and State

Name & Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Jane Doe was born in 1994. She resides in the state of Kansas. On December 25, 2008, Jane Doe was pulled over by Sheriff's deputies near Perryton, Texas, for failing to activate her headlights. Jane Doe was detained when officers realized that she was fourteen years-old and driving without a license. Jane Doe told officers that she had stolen her mother's truck and ran away from home.

She said that she was traveling to Lovington, New Mexico, to meet a man who had previously identified himself as STEVE STEVENS. She said she had met STEVENS approximately a year ago in an internet chat-room. JANE DOE told STEVENS she was only 13 years-old when they began communicating. She stated STEVENS expressed a romantic interest in her. The two frequently had conversations, both live conversations over the phone and online text messaging and chat sessions, of a sexual nature. When STEVENS communicated with Jane Doe via phone, he used the cellular telephone number (575) 441-6438. Jane Doe said STEVENS brought up the subject of sex in almost every communication. STEVENS discussed traveling to Kansas to meet Jane Doe, but Jane Doe declined.

After running away in her mother's car on December 25, 2008, Jane Doe called STEVENS. STEVENS was aware that Jane Doe had a history of problems at home with her parents, and he suggested that she drive to Lovington, New Mexico, to stay with him. STEVENS tried to give Jane Doe directions, but Jane Doe said she could not remember them and would get them

later. STEVENS then sent a text message to Jane Doe with directions to Lubbock, Texas, and he called her to confirm that she had received the message. STEVENS called Jane Doe again three more times during her drive to find out where she was located.

After Jane Doe was detained in Perryton, Texas, she consented to law enforcement officers monitoring her calls to STEVENS, and she made three additional calls. During those calls, STEVENS indicated that he was aware of Jane Doe's age when he asked her how she could get a hotel room without identification. In response to Jane Doe's question regarding what they were going to do when they met, STEVENS' replied, "make love."

STEVENS and JANE DOE had another telephone conversation on December 26, 2008, at approximately 2:00 p.m. During this phone call, JANE DOE told STEVENS that she ran out of gas and was at a Phillips 66 gas station at the intersection of Interstate 27 and 34th Street in Lubbock, Texas. STEVENS said that he would come and pick her up. He stated that he would be driving a silver van.

At approximately 5:00 p.m., on December 26, 2008, STEVENS appeared at the Phillips 66 gas station at the intersection of Interstate 27 and 34th Street in Lubbock, Texas, driving a silver-colored van.

Upon his arrival, STEVENS was detained by agents from the Federal Bureau of Investigation, and was provided his Advice of Rights. STEVENS acknowledged understanding his rights, and voluntarily stated that he was aware Jane Doe was 14 years-old.